



Diller Telephone Company
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Diller, NE 68342
402-793-5330 or 1-877-668-9749



Your Local Link to the World!

February 12, 2019

Filed Electronically Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: ED Docket No. 06-36, Annual 47 C.F.R. Section 64.2009(e) CPNI Certification Filing for DTC Holding Co., dba Diller Telephone Company and Diode Telecom Inc., dba Diode Communications.

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate of DTC Holding Co., dba Diller Telephone Company (499 Filer ID No. 804462) and Diode Telecom Inc., dba Diode Communications (499 Filer ID No. 830229) for 2018 along with the accompanying Statement of Compliance and Procedures.

Please contact me at 402-793-5330 or lorend@diodecom.net with any questions or concerns.

Sincerely,

Loren Duerksen
General Manager

Annual 47 C.F.R. Section 64.2009(e) CPNI Certification

EB Docket 06-36

Annual Section 64.2009(e) CPNI Certification for 2019, covering prior calendar year 2018.

1. Date Filed February 12 2019.
2. Name of Companies covered by this certification 499 Filer ID
 - a. DTC Holding Co., dba Diller Telephone Company 804462
 - b. Diode Telecom Inc., dba Diode Communications 830229
3. Name of signatory: Loren Duerksen
4. Title of signatory: General Manager
5. Certification:

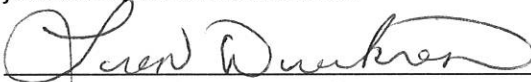
I, Loren Duerksen, certify that I am an officer of the Companies named above, and acting as an agent of the companies, that I have personal knowledge that the Companies has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. Section 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Companies procedures ensure that the Companies is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules (See attached Statement of Compliance.)

The Companies has not taken any actions (i.e., proceedings instituted or petitions filed by the Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Companies does not have any information that pretexters have attempted to gain access to CPNI.

The Companies has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Further, there has been no unauthorized access, disclosure to unauthorized individuals, or instances of improper access to online information by individuals not authorized to view CPNI during the past year.

The companies represents and warrants that the above certification is consistent with 47 C.F.R. Section 1.17, which requires truthful and accurate statements to the Commission. The Companies also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement actions.

Signed: 
Loren Duerksen, General Manager

Attachment: Statement of CPNI Compliance and Procedures

DTC Holding Co(dba Diller Telephone Company) and Diode Telcom Inc(dba Diode Communications)
here in as the Company explanation of the Company's procedures to ensure that the Company is in
compliance with FCC CPNI requirements.

The Company does not use CPNI for marketing purposes. Accordingly, the Company's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, the Company has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in Company procedures and training of Company personnel with regard to non-use of CPNI data.

The Company trains and reminds employees on CPNI compliance to what information may be discussed as Routine Carrier-Customer Service and Billing Relations, given information provided by customer to the employee.

Employees are instructed to protect CPNI from pretexters and the like by obtaining passwords from our customers and requiring those passwords before releasing CPNI. Customers are informed not to use social security numbers, birthdays, mother's maiden name or any other common identity form. Our employees are also instructed to use call back numbers and; or written response which are sent to the numbers given by our customers and the addresses given by our customers as addresses to send correspondence on CPNI. These numbers, addresses and passwords are originally obtained by verification of the party who is providing the information by using proper methods of authenticating, whether by picture i.d., main telephone number call back and; or main billing address letter.

Employees are instructed to notify the customers immediately when certain account changes are made, such as but not limited to: password; customer back-up means for lost or forgotten password; online account-n/a; or address of record. We do not have online account accessibility.

Employees are instructed to notify management, law enforcement, customers and the FCC and the Nebraska Public Service Commission in the event of a CPNI breach.

Our employees are instructed to obtain explicit consent from a customer before disclosing a customer's CPNI to a carrier's joint venture partners or independent contractors for the purposes of marketing communications-related services to that customer; however, our Company does not release information for marketing purposes to anyone.

Employees are instructed to keep records of any CPNI breach for at least two years.

The Company secures its network.

Our Company sends an annual notice out to our customers regarding their privacy rights over their CPNI and whether they do not desire to receive any information on products and/or services provided by our Company or any of its d/b/a's or affiliates.

Any outside billing agency has been instructed to not release any CPNI that they may receive during the course of their functions for the Company.

Diller Telephone Company

**SUMMARY OF CUSTOMER COMPLAINTS
REGARDING UNAUTHORIZED RELEASE OF CPNI**

- A. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

NONE

- B. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

NONE

- C. During Calendar Year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

NONE

- D. During Calendar Year 2018, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

NONE

The importance of CPNI protection is frequently brought up during the course of a year.

Attachment –B

Diller Telephone Company

STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS

- A. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

NONE

- B. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Nebraska Public Service Commission:

NONE

- C. During Calendar Year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the following federal or state courts:

NONE